

1 MICHAEL R. AYERS  
2 Nevada Bar No. 10851  
3 HINSHAW & CULBERTSON LLP  
4 2375 E. Camelback Road, Suite 750  
5 Phoenix, AZ 85016  
6 Telephone: 602-631-4400  
7 Facsimile: 602-631-4404  
8 mayers@hinshawlaw.com  
9 and  
10

11 GINA M. MUSHMECHE  
12 Nevada Bar No. 10411  
13 KRAVITZ, SCHNITZER, & JOHNSON,  
14 CHTD  
15 8985 S. Eastern Avenue, Suite 200  
16 Las Vegas, NV 89123  
17 Telephone: 702-362-6666  
18 Facsimile: 702-362-2203  
19 gmushmeche@kssattorneys.com  
20

21 Attorneys for Credit Protection Association, LP

22 **UNITED STATES DISTRICT COURT**

23 **DISTRICT OF NEVADA**

24 NICOLE MARTIN, ) Case No. 2:17-cv-00012-KJD-NJK  
25 Plaintiff, )  
26 v. )  
27 CREDIT PROTECTION ASSOCIATION, LP, ) **STIPULATION AND ORDER  
28 Defendant. ) EXTENDING DEADLINE FOR  
Defendant. ) DEFENDANT TO RESPOND TO  
Plaintiff's Complaint**

29 COMES NOW, Defendant Credit Protection Association, LP ("CPA"), and Plaintiff,  
30 Nicole Martin ("Plaintiff"), by and through their respective counsel of record, stipulate and agree  
31 to extend the deadline to March 31, 2017, for CPA to answer or otherwise plead in response to  
32 Plaintiff's Complaint.

33 This is CPA's first request for an extension, which it requested from Plaintiff in order to  
34 allow CPA additional time to investigate the factual allegations of the Complaint. Plaintiff has no  
35 opposition to CPA's request for an extension.

36 No additional requests for extensions are contemplated.

1 **IT IS SO STIPULATED.**  
2

DATED this 9<sup>th</sup> day of March, 2017.

3 THE LAW OFFICES OF ROBERT M.  
4 TZALL

5 */s/ Robert N. Tzall (with permission)*

6 Robert M. Tzall, Esq.  
7 Nevada Bar No. 13412  
7735 Commercial Way, Suite 100  
Henderson, NV 89011  
Telephone: 702-666-0233  
Primary: robert@tzalllegal.com  
9 *Attorneys for Plaintiff*

HINSHAW & CULBERTSON LLP

5 */s/ Michael R. Ayers*

6 Michael R. Ayers, Esq.  
7 Nevada Bar No. 10851  
2375 E. Camelback Road, Suite 750  
Phoenix, AZ 85016  
8 Telephone: 602-631-4400  
Facsimile: 602-631-4404  
9 Primary: mayers@hinshawlaw.com  
*Attorneys for Defendant Credit Protection*  
10 *Association, LP*

11 KRAVITZ, SCHNITZER & JOHNSON,  
12 CHTD

13 */s/ Gina M. Mushmeche*

14 Gina M. Mushmeche, Esq.  
15 Nevada Bar No. 10411  
8985 S. Eastern Avenue, Suite 200  
16 Las Vegas, Nevada 89123  
17 Tel: 702-362-6666  
gmushmeche@ksjattorneys.com  
*Attorneys for Defendant Credit Protection*  
18 *Association, LP*

**ORDER**

19 IT IS SO ORDERED:

20 Dated: March 9, 2017

21   
22 *United States Magistrate Judge*